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February 14, 2018

Regional Freedom of Information Officer
U.S. EPA, Region 5
77 West Jackson Boulevard (MI-9J)
Chicago, IL 60604-3590
Phone: (312) 886-6686

Re: FOIA Request for Records Relating to Dr. Richard DeGrandchamp

Dear Sir or Madam:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, please forward to my attention any and all documents, correspondence, and information relating to the investigations involving Dr. Richard DeGrandchamp ("Dr. DeGrandchamp") including the following:

- A. Copies of any and all written or electronic documents, correspondence, and information relating to Dr. DeGrandchamp providing toxicological expertise in a case against a steel manufacturing facility in Ohio on behalf of the Department of Justice and EPA Region 5. This request includes, but is not limited to, any and all reports, memoranda, studies, and notes relating to toxicological evaluations for residents who lived near the AK Steel Superfund Site and had been eating PCB-contaminated fish caught in a nearby river. Upon information and belief, the litigation regarding this matter was eventually settled.

This request includes the following categories of information:

1. Transcripts of hearings, depositions, and/or trial testimony of Dr. DeGrandchamp;
2. Statements, interrogatories, declarations, and/or affidavits of Dr. DeGrandchamp;
3. Draft and final reports – including progress reports, consultant reports, and/or expert reports authored by Dr. DeGrandchamp;
4. Draft and final protocols involving Dr. DeGrandchamp's work;

5. Communications including letters, emails, and/or phone records – to / from Dr. DeGrandchamp and when he was copied;
6. Invoices and/or bills related to Dr. DeGrandchamp's work;
7. Photographs and/or videos pertaining to Dr. DeGrandchamp's testimony or work;
8. Documentation of site visits and/or inspections;
9. Internal memoranda, emails, and/or correspondence pertaining to the government's decision to retain Dr. DeGrandchamp.

In order to help you to determine my status to assess fees, you should know that I am an attorney for a public corporation and am seeking information for use on behalf of the corporation's business. To the extent these documents are available on CD or electronically, I prefer to receive them in that format. If costs associated with this request will exceed \$500.00, please notify me with an estimate; I will promptly respond regarding incurring the additional costs.

Thank you in advance. If you have any questions or concerns, please contact me via e-mail or via telephone at the information provided above.

Sincerely,



Michael W. Cromwell
Attorney